FOR THE WEST	STATES DISTRICT COURTY ERN DISTRICT OF TEXAS ASO DIVISION 7 / 5: /5
UNITED STATES OF AMERICA,	
Plaintiff,	
v.) NO. EP-11-M-3630
ROBERT E. CUFF,	
Defendant.)

GOVERNMENT'S MOTION TO DETAIN DEFENDANT WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

- 1. The Defendant has been charged by Complaint with a violation of Title 18, United States Code, Section 2251(d)(1) & (e), Conspiracy to Advertise the Distribution of Child Pornography, and Title 18, United States Code, Section 2252A(a)(2)(A) & (b)(1), Conspiracy to Distribute Child Pornography.
- 2. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
- 3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN E. MURPHY UNITED STATES ATTORNEY

BY:

J. BRAND GARDES

Assistant U.S. Attorney California Bar # 144770

700 E. San Antonio, Suite 200

El Paso, Texas 79901

(915) 534-6884